

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

PAINTERS DISTRICT COUNCIL NO. 58, et. al.,	)	
	)	
Plaintiffs,	)	
	)	Case No: 4:21-cv-00639-MTS
v.	)	
	)	
RON WARD D/B/A RON WARD PAINTING	)	
AND RON WARD PAINTING & DECORATING	)	
	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF PARTIAL DEFAULT JUDGMENT AND DEFAULT  
ORDER TO COMPEL ACCOUNTING**

COME NOW Plaintiffs, by undersigned counsel, and respectfully move this Court for entry of partial default judgment against Defendant Ron Ward d/b/a Ron Ward Painting and Ron Ward Painting & Decorating. Defendant was served with the Summons and Complaint on June 19, 2021. [Doc. No. 5]. As of today's date Defendant has not filed any responsive pleadings. The Clerk of Court granted Plaintiffs' Motion for Entry of Clerk's Default against Defendant, on July 27, 2021. [Doc. No. 7].

Pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, Plaintiffs move this Court to enter an order compelling a payroll audit of Defendant's financial books and records covering the time period from January 1, 2018 to date within thirty (30) days of the Court's Order at Defendant's expense, so that the Court can subsequently determine and adjudicate the amount of damages due and owing to Plaintiffs for that time period and enter judgment for that amount.

Respectfully Submitted

HARTNETT REYES-JONES, LLC

/s/ Matthew J. Gierse  
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Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

THE UNDERSIGNED HEREBY CERTIFIES that on November 30, 2021, the foregoing was mailed by United States Postal Service to the following non-participants in Electronic Case Filing: Defendant Ron Ward d/b/a Ron Ward Painting and Ron Ward Painting & Decorating, 18463 Sweetgum Rd., Centralia, IL 62801.

/s/ Matthew J. Gierse